

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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ADRIAN SCHOOLCRAFT,

Plaintiff,

-against-

THE CITY OF NEW YORK, DEPUTY CHIEF MICHAEL MARINO, Tax Id. 873220, Individually and in his Official Capacity, ASSISTANT CHIEF PATROL BOROUGH BROOKLYN NORTH GERALD NELSON, Tax Id. 912370, Individually and in his Official Capacity, DEPUTY INSPECTOR STEVEN MAURIELLO, Tax Id. 895117, Individually and in his Official Capacity, CAPTAIN THEODORE LAUTERBORN, Tax Id. 897840, Individually and in his Official Capacity, LIEUTENANT JOSEPH GOUGH, Tax Id. 919124, Individually and in his Official Capacity, SGT. FREDERICK SAWYER, Shield No. 2576, Individually and in his Official Capacity, SERGEANT KURT DUNCAN, Shield No. 2483, Individually and in his Official Capacity, LIEUTENANT CHRISTOPHER BROSCHART, Tax Id. 915354, Individually and in his Official Capacity, LT. TIMOTHY CAUGHEY, Tax Id. No. 885374, Individually and in his Official Capacity, SERGEANT SHANTEL JAMES, Shield No. 3004, Individually and in her Official Capacity, SERGEANT RICHARD WALL, Shield No. 3099, Individually and in his Official Capacity, SERGEANT ROBERT W. O'HARE, Tax Id. 916960, Individually and in his Official Capacity, SERGEANT SONDRA WILSON, Shield No. 5172, Individually and in her Official Capacity, LIEUTENANT THOMAS HANLEY, Tax Id. 879761, Individually and in his Official Capacity, CAPTAIN TIMOTHY TRAINOR Tax Id. 899922, Individually and in his Official Capacity, and P.O.'s "JOHN DOE" #1-50, Individually and in their Official Capacity (the name John Doe being fictitious, as the true names are presently unknown) (collectively referred to as "City Defendants"), FDNY LIEUTENANT ELISE HANLON, individually and in her official capacity as a lieutenant with the New York City Fire Department, JAMAICA HOSPITAL MEDICAL CENTER, DR. ISAK ISAKOV, Individually and in his Official Capacity, DR. LILIAN ALDANA-BERNIER, Individually and in his Official Capacity and JAMAICA HOSPITAL MEDICAL CENTER EMPLOYEE'S "JOHN DOE" # 1-50, Individually and in their Official Capacity (the name John Doe being fictitious, as the true names are presently unknown),

Defendants.

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**DECLARATION OF RYAN
GLENN SHAFFER IN
SUPPORT OF CITY
DEFENDANTS'
OPPOSITION TO
PLAINTIFF'S MOTION FOR
PARTIAL SUMMARY
JUDGMENT**

10-CV-6005 (RWS)

RYAN GLENN SHAFFER, declares pursuant to 28 U.S.C. § 1746, under penalty of perjury, that the following is true and correct:

1. I am a Senior Counsel in the office of Zachary W. Carter, Corporation Counsel of the City of New York, attorney for defendants the City of New York, Deputy Chief Michael Marino, Assistant Chief Gerald Nelson, Captain Theodore Lauterborn, Lieutenant William Gough, Sergeant Frederick Sawyer, Sergeant Kurt Duncan, Lieutenant Christopher Broschart, Lieutenant Timothy Caughey, Lieutenant Shantel James, Sergeant Richard Wall, Sergeant Robert W. O'Hare, Sergeant Sondra Wilson, Lieutenant Thomas Hanley, Captain Timothy Trainor, and FDNY Lieutenant Elise Hanlon (collectively "City Defendants"). As such, I am familiar with the facts stated below and submit this declaration to place on the record the relevant documents in support of said City Defendants' opposition to plaintiff's motion for partial summary judgment pursuant to Rule 56 of the Federal Rules of Civil Procedure.

2. Attached as Exhibit "A" is a true and accurate copy of relevant portions of defendant Michael Marino's Deposition Transcript taken October 8, 2013.

3. Attached as Exhibit "B" is a true and accurate copy of relevant portions of defendant Frederick Sawyer's Deposition Transcript taken April 25, 2014.

Dated: New York, New York
February 11, 2015

ZACHARY W. CARTER
Corporation Counsel of the
City of New York
Attorney for City Defendants
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By: _____/s
Ryan G. Shaffer
Senior Counsel
Special Federal Litigation Division

cc: Nathaniel Smith (By ECF)
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MARTIN CLEARWATER & BELL LLP
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Attorneys for Lillian Aldana-Bernier

Walter Kretz (By ECF)
SCOPPETTA SEIFF KRETZ & ABERCROMBIE
Attorney for Defendant Mauriello

Docket No 10-CV-6005 (RWS)	
UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK	
ADRIAN SCHOOLCRAFT, -against- THE CITY OF NEW YORK, et al.,	Plaintiff, Defendants.
DECLARATION OF RYAN G. SHAFFER	
<p>ZACHARY W. CARTER <i>Corporation Counsel of the City of New York</i> <i>Attorney for City Defendants</i> <i>100 Church Street, Room 3-212</i> <i>New York, New York 10007</i></p> <p><i>Of Counsel: Ryan G. Shaffer</i> <i>Tel: (212) 356-2386</i></p>	
<p><i>Due and timely service is hereby admitted.</i></p> <p><i>New York, N.Y....., 2015</i></p> <p>..... <i>Esq.</i></p> <p><i>Attorney for.....</i></p>	